

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

Case No. 17-mc-151-LPS

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

**MOTION FOR EXEMPTION OF PERSONS FROM THE DISTRICT OF DELAWARE’S
MAY 17, 2024 STANDING ORDER ON PERSONAL DEVICES**

Gold Reserve Ltd. f/k/a Gold Reserve Inc. (“Gold Reserve”) hereby respectfully moves the Court to exempt the below individuals from the District of Delaware’s May 17, 2024 Standing Order titled *In re: Procedures Regarding the Possession and Use Cameras and Personal Electronic Devised by Visitors to the J. Caleb Boggs Federal Building and Unites States Courthouse* (the “Standing Order”). In support of its motion, Gold Reserve states as follows:

1. The Standing Order placed restrictions on the ability to bring personal electronic devices, including laptops and cell phones, into the J. Caleb Boggs Federal Building, which requires visitors to place personal electronic devices in a locked pouch, not to be used while in the J. Caleb Boggs Federal Building.

2. A trial is scheduled in the above-captioned action on September 15, 2025 through September 18, 2025 with possible additional time on October 20-21, 2025 (the “Hearing”).

3. The following intend to appear at the Hearing and require access to their electronic devices, but do not meet the exemptions listed in Paragraph 4 of the May 17, 2024 Standing Order:

a. Paul Rivett (representative for Gold Reserve)

b. Chris Bennett (witness for Gold Reserve)

- c. Michael J. Bowe, Esq. of Brown Rudnick LLP (counsel for Gold Reserve)
- d. Cynthia Giobbe (paralegal for Womble Bond Dickinson (US) LLP)

WHEREAS, for the foregoing reasons, Gold Reserve respectfully requests that the Court enter the attached proposed order to exempt certain persons from the District of Delaware's May 17, 2024 Standing Order.

Dated: September 11, 2025

Respectfully submitted,

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